

### **REMARKS**

Prior to entry of this amendment, claims 1-20 are pending in the subject application. Claims 1 and 10 have been amended. Claims 1 and 10 are independent. Claims 1-20 are presented to the Examiner for further consideration on the merits.

#### **A. Introduction**

In the outstanding Office Action Made Final, the Examiner rejected claims 1, 4-10, 15 and 19 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,058,076 to Jiang ("the Jiang reference"); rejected claims 2, 3 and 11-14 under 35 U.S.C. § 103(a) as being unpatentable over the Jiang reference in view of U.S. Patent No. 6,560,217 to Peirce et al. ("the Peirce et al. reference"); and rejected claims 16-18 and 20 under 35 U.S.C. § 103(a) as being unpatentable over the Jiang reference in view of the U.S. Patent No. 7,042,988 to Juitt et al. ("the Juitt et al. reference").

#### **B. Asserted Anticipation Rejection of Claims 1, 4-10, 15 and 19**

In the outstanding Office Action Made Final, the Examiner rejected claims 1, 4-10, 15 and 19 under 35 U.S.C. § 102(e) as being anticipated by the Jiang reference. This rejection is respectively traversed for at least the reasons set forth below.

Claims 1 and 10 recite that a plurality of Internet protocol (IP) routers, a home agent (HA), and an authorization authentication accounting (AAA) are on the same public Internet network. By using the public Internet network, the present invention may realize a cost reduction required for hardware implementation, while a conventional network structure, such as that disclosed in the Jiang reference, hierarchically constructs each device performing a specific function, e.g., mobility management or AAA, using a unique and expensive private network. In particular, it is respectfully submitted that the Jiang reference fails to disclose or suggest locating the AAA server on the same public network as that on which the HA is located, to perform separate functions on the public Internet network, as recited in claims 1 and 10.

Further, claims 1 and 10 now recite that each of the plurality of radio access points (RAPs) directly connects "mobile terminals to the public Internet network to transmit packet data." Support for this limitation may be found, for example, in paragraph [0021] of the instant application as originally filed.

It is respectfully submitted that the Jiang reference fails to disclose or suggest any device or function corresponding to the RAP as recited in claims 1 and 10. In particular, the Jiang reference needs a plurality of unique private networks for communication with a packet network, such as the public Internet, as shown, for example, in FIGS. 1 and 3 of the Jiang

reference. Accordingly, the Jiang reference needs an additional conversion process performed, e.g., by a converter 210, in each gateway when transmitting packet data, since the gateways connect the networks. In contrast, as recited in claims 1 and 10, packet data is directly transmitted by the RAPs to the public Internet network, i.e., without conversion.

Therefore, it is respectfully submitted that the Jiang reference fails to disclose or suggest the limitations recited in claims 1 and 10. The remaining rejected claims depend, either directly or indirectly, from claims 1 or 10, and are believed to have the rejection thereof obviated for at least the reasons set forth above. Therefore, it is respectfully requested that this rejection be withdrawn

C. Asserted Obviousness Rejection of Claims 2, 3 and 11-14

In the outstanding Office Action Made Final, the Examiner rejected claims 2, 3 and 11-14 under 35 U.S.C. § 103(a) as being unpatentable over the Jiang reference in view of the Peirce et al. reference. This rejection is respectfully traversed for at least the reasons set forth below.

The Peirce et al. reference does not provide the teachings noted above as missing from the Jiang reference with respect to claims 1 and 10. Therefore, it is respectfully submitted that claims 2 and 3, which depend from claim 1, and claims 11-14, which depend from claim 10, are allowable for at least the reasons set forth above.

D. Asserted Obviousness Rejection of Claims 16-18 and 20

In the outstanding Office Action Made Final, the Examiner rejected claims 16-18 and 20 under 35 U.S.C. § 103(a) as being unpatentable over the Jiang reference in view of the Juitt et al. reference. This rejection is respectfully traversed for at least the reasons set forth below.

The Juitt et al. reference fails to provide the teachings noted above as missing from the Jiang reference with respect to claim 10. Claims 16-18 and 20 depend, either directly or indirectly, from claim 10, and are believed to be allowable for at least the reasons set forth above.

E. Entry of Amendment Requested

Entry of the above amendment after final is respectfully requested. The amendment reduces issues and consideration thereof does not impose an undue burden on the Examiner.

F. Conclusion

The remaining documents cited by the Examiner were not relied upon to reject the claims. Therefore, no comments concerning these documents are considered necessary at this time.


The above remarks demonstrate the failings of the Examiner's arguments with respect to the outstanding rejections, and are sufficient to overcome them. However, while these remarks may refer to particular claim elements, they are not intended to, nor need they, comprehensively address each and every reason for the patentability of the claimed subject matter over the applied art. Accordingly, applicants respectfully submit that the claims are allowable for reasons including, but not limited to, those set forth above, and patentability of the claims does not depend solely on the particular claim elements discussed above.

If the Examiner believes that additional discussions or information might advance the prosecution of the instant application, the Examiner is invited to contact the undersigned at the telephone number listed below to expedite resolution of any outstanding issues.

In view of the foregoing remarks, reconsideration of this application is earnestly solicited, and an early and favorable further action upon all the claims is hereby requested.

Respectfully submitted,  
LEE & MORSE, P.C.

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Susan S. Morse, Reg. No. 35,292

**LEE & MORSE, P.C.**  
3141 FAIRVIEW PARK DRIVE, SUITE 500  
FALLS CHURCH, VA 22042  
703.207.0008 TEL  
703.207.0003 FAX

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DEPOSIT ACCOUNT CHARGE AUTHORIZATION

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